



**NEW YORK CITY HOUSING AUTHORITY  
LAW DEPARTMENT**  
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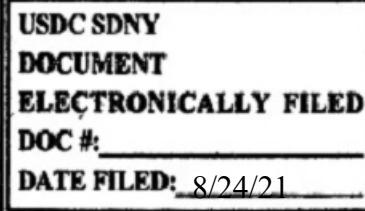
**GREGORY P. RUSS**  
Chair & CEO

**LISA BOVA-HIATT**  
EVP of Legal Affairs and General Counsel

WRITER'S DIRECT LINE  
(212) 776-5043

# MEMO ENDORSED

August 24, 2021



## VIA CM/ECF

Hon. Barbara Moses, U.S.M.J.  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Room 740  
New York, NY 10007

**Re: *Shyamal Ghosh v. New York City Housing Authority*. No. 21-cv-06139 (AT)(BCM)  
Joint Request For Adjournment of Rule 16 Conference**

Dear Magistrate Judge Moses:

I am counsel for Defendant New York City Housing Authority ("NYCHA") in the above-referenced matter. With the consent of Pro se Plaintiff Shyamal Ghosh, I respectfully submit this letter on behalf of the Parties to request adjournment of the Initial Case Management Conference in this matter, currently scheduled to take place via teleconference on Wednesday, August 25, 2021 at 10:00 a.m. (**ECF No. 7**), until **Wednesday, September 29, 2021**, or, in the alternative, until **Wednesday, October 6, 2021**, or until such time thereafter as the Court finds mutually convenient.

This is the Parties' first joint request for an adjournment of their Rule 16 Conference. As all future dates and discovery deadlines have yet to be scheduled, no scheduled dates will be affected by this Request.

Good cause exists for the Parties' request for adjournment to be granted. While the parties have already taken part in an initial conference pursuant to their obligations under Fed. R. Civ. P. 26 and Your Honor's pretrial case management Order of July 28, 2021, the Parties were only able to meet for an hour and therefore unable to complete their Rule 26(f) conference and need to discuss several outstanding issues relating to scheduling and case management that will inform the Parties' proposal for a Joint Discovery Plan.

As a result of scheduling conflicts brought about by defense counsel's September trial calendar and a (pre-planned) vacation that began last week, the Parties are unlikely to reconvene until the second week of September. The Parties believe having an additional month to meet and confer will provide sufficient time to set a joint course for discovery and iron out any preliminary case management issues prior to meeting with Your Honor for an Initial Rule 16 Conference.

For each and all of the foregoing reasons, the Parties request an adjournment of tomorrow's Rule 16 conference until **Wednesday, September 29, 2021**, or, in the alternative, until **Wednesday, October 6, 2021**, or until such time thereafter as the Court finds mutually convenient.

Respectfully submitted,

/s/ Sean-Patrick Wilson

Sean-Patrick Wilson (SW7862)  
Associate General Counsel  
New York City Housing Authority  
Law Department  
90 Church Street, 11<sup>th</sup> Floor  
New York, NY 10007  
Email: [Sean-Patrick.Wilson@nyc.gov](mailto:Sean-Patrick.Wilson@nyc.gov)

cc: Plaintiff Shyamal Ghosh (via Email)

Application GRANTED. The August 25, 2021 conference is ADJOURNED to **September 29, 2021 at 11:00 a.m.** SO ORDERED.



Barbara Moses  
United States Magistrate Judge  
August 24, 2021